

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

C.P., by and through his parents, Patricia  
Pritchard and Nolle Pritchard; and  
PATRICIA PRITCHARD,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF  
ILLINOIS,

Defendant.

NO. 3:20-cv-06145-RJB

DECLARATION OF ELEANOR  
HAMBURGER IN SUPPORT OF  
PLAINTIFFS' CONSOLIDATED CROSS-  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT AND OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT

**Note on Motion Calendar:**  
**November 21, 2022 (see Dkt. No. 90)**

I, Eleanor Hamburger, declare under penalty of perjury and in accordance with  
the laws of the State of Washington and the United States that:

1. I am a partner at Sirianni Youtz Spoonemore Hamburger and am one of  
the attorneys for plaintiffs in this action.

2. **Exhibits.** Attached are true and correct copies of the following documents,  
with underlining where appropriate for the Court's convenience:

| Exhibit | Description  | Date       |
|---------|--|------------|
| 1.      | Excerpts of Zoom Video Deposition Upon Oral Examination<br>of Telisa Drake (BCBSIL Rule 30(b)(6)) - CONFIDENTIAL | 05/13/2022 |

| Exhibit | Description  | Date       |
|---------|--|------------|
| 2.      | Excerpts of Summary Plan Description – Catholic Health Initiatives Medical Plan – Blue Cross Blue Shield Integrated  | 0/01/2017  |
| 3.      | Letter from Kevin Hatfield, M.D. [Dkt. No. 38-9]   | 07/11/2019 |
| 4.      | Letter from Sharon Booker, M.A., L.M.H.C.  | 07/24/2019 |
| 5.      | Notes from Jeffrey Kylo, M.D.  | 04/30/2019 |
| 6.      | Expert Report of Dr. Randi C. Ettner, Ph.D. – CONFIDENTIAL   | 04/04/2022 |
| 7.      | Expert Report of Dr. Dan H. Karasic, M.D. – CONFIDENTIAL   | 04/04/2022 |
| 8.      | Expert Report of Dr. Loren S. Schechter, M.D. – CONFIDENTIAL   | 04/02/2022 |
| 9.      | E. Coleman, et al., (2022) <i>Standards of Care for the Health of Transgender and Gender Diverse People, Version 8</i> , International Journal of Transgender Health, 23:sup1, S1-S259, DOI: 10.1080/26895269.2022.2100644, accessed at: <a href="https://www.tandfonline.com/doi/pdf/10.1080/26895269.2022.2100644">https://www.tandfonline.com/doi/pdf/10.1080/26895269.2022.2100644</a> (last visited 10/23/2022) | 09/15/2022 |
| 10.     | Excerpts of Zoom Video Deposition Upon Oral Examination of Kim Reed (BCBSIL Rule 30(b)(6)) – CONFIDENTIAL  | 06/02/2022 |
| 11.     | Excerpts of Remote Videotaped Deposition Upon Oral Examination of Sharon Booker, MA, LMHC  | 05/06/2022 |
| 12.     | Excerpts of Remote Videotaped Deposition Upon Oral Examination of Patricia Pritchard   | 03/11/2022 |
| 13.     | Excerpts of Remote Videotaped Deposition Upon Oral Examination of Randi C. Ettner, Ph.D.   | 08/24/2022 |
| 14.     | Excerpts of Remote Videotaped Deposition Upon Oral Examination of Dan H. Karasic, MD   | 07/13/2022 |

| Exhibit | Description   | Date       |
|---------|---|------------|
| 15.     | Excerpts of Zoom Video Deposition Upon Oral Examination of Michael Laidlaw  | 09/02/2022 |
| 16.     | Excerpts of Remote Videotaped Deposition Upon Oral Examination of Kevin Hatfield, M.D.  | 06/14/2022 |
| 17.     | Excerpts of Zoom Video Deposition Upon Oral Examination of Mark Larson (BCBSIL Rule 30(b)(6))   | 06/02/2022 |
| 18.     | Blake, Valarie K., <i>An Opening for Civil Rights in Health Insurance After the Affordable Care Act</i> , 36 B.C. J.L. & SOC. JUST. 235 | 06/2016    |
| 19.     | Plaintiff's Answer to Defendant's Interrogatory No. 5   | 01/26/2022 |
| 20.     | BCBSIL denial of second Vantas Implant  | 08/08/2019 |
| 21.     | Voir dire Examination of Dr. Laidlaw taken in <i>Dekker, et al. v. Marstiller, et al.</i> , USDC (N.D. Florida), Case No. 4:22cv325     | 10/12/2022 |

DATED this 24th day of October, 2022, at Seattle, Washington.

/s/ Eleanor Hamburger

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